

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

ANDRE LEVON GLOVER (1)  
MAURICE LAMONT DAVIS (2)

NO. 3:15-CR-

**3-15 CR 0094 - P**

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Interfere with Commerce by Robbery  
(Violation of 18 U.S.C. § 1951(a))

On or about June 16, 2014, and continuing until on or about June 22, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others unknown to the Grand Jury, to commit a certain offense against the United States, to-wit: robbery, in violation of 18 U.S.C. § 1951(a), a crime of violence.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of cartons of cigarettes and United States currency, from the persons and in the presence of Murphy Oil USA employees, in their capacities as employees of Murphy Oil USA locations in Lancaster, Dallas, Mansfield, and Midlothian, all cities in the Northern

District of Texas, against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons, that is, by using and brandishing a firearm.

MANNER AND MEANS

It was part of the conspiracy that **Andre Levon Glover** (hereafter "**Glover**"), **Maurice Lamont Davis** (hereafter "**Davis**") discussed and planned with each other, and with others unknown, the robbery of the various Murphy Oil USA locations in cities of Lancaster, Dallas, Mansfield, and Midlothian, Texas, as identified in this indictment. At all times during the course and scope of the conspiracy, the above-referenced Murphy Oil USA stores conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as contemplated in 18 U.S.C. § 1951. It was further part of the conspiracy that **Glover** and **Davis** and others unknown formulated a plan and agreement which, among other things, included:

- a. the acquisition of United States currency;
- b. the acquisition of cartons of cigarettes;
- c. the selection of the Murphy Oil USA store to be robbed;
- d. the means of transportation to commit the robbery;
- e. the use of a firearm to intimidate the store employees;
- f. the role each robbery participant would play in the robbery; and,
- g. plans to avoid detection and apprehension by law enforcement.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

1. On or about June 16, 2014, **Glover** and **Davis** drove together in a vehicle to the Murphy Oil USA store, located at 170 N. Interstate 35E, Lancaster, Texas, with the specific intent to commit robbery. Before robbing the store employee at gunpoint, they disguised their identities by each wearing a head covering, long-sleeved clothing, gloves, and a bandana or bandana-like item which partially covered each of their faces to facilitate the commission of the robbery and avoid detection and apprehension by law enforcement. They forced the employee to open the storage room of the store, secured cartons of cigarettes, and then fled the store.

2. On or about June 21, 2014, **Glover** and an unknown female drove together in a vehicle to the Murphy Oil USA store, located at 3102 W. Wheatland Road, Dallas, Texas, with specific intent to commit robbery. Before robbing the store employee at gunpoint, **Glover** disguised his identity by wearing a head covering, long-sleeved clothing, gloves, and a bandana or bandana-like item which partially covered his face. The unknown female remained in the vehicle and wore a scarf or scarf-like item over her face. Each did so to facilitate the commission of the robbery and avoid detection and apprehension by law enforcement. They forced the employee to open the storage room of the store, secured cartons of cigarettes, and then fled the store.

3. On or about June 22, 2014, **Glover** and **Davis** drove together in a vehicle to the Murphy Oil USA store, located at 950 N. Walnut Creek Drive, Mansfield, Texas, with the specific intent to commit robbery. Before robbing the store employee at gunpoint, they disguised their identities by each wearing a head covering, long-sleeved

clothing, gloves, and a bandana or bandana-like item which partially covered each of their faces to facilitate the commission of the robbery and avoid detection and apprehension by law enforcement. They forced the employee to open the storage room of the store, secured cartons of cigarettes, and fled the store.

3. On or about June 22, 2014, **Glover** and **Davis** drove together in a vehicle to the Murphy Oil USA store, located at 100 Walton Way, Midlothian, Texas, with the specific intent to commit robbery. Before robbing the store employee at gunpoint, they disguised their identities by each wearing a head covering, long-sleeved clothing, gloves, and a bandana or bandana-like item which partially covered each of their faces to facilitate the commission of the robbery and avoid detection and apprehension by law enforcement. They held-up the store employee behind the counter in the store, secured cartons of cigarettes and United States currency, and then fled the store.

In violation of 18 U.S.C. § 1951(a).

Count Two

Using, Carrying, and Brandishing a Firearm During and in Relation to, and Possessing and Brandishing a Firearm in Furtherance of, a Crime of Violence  
(Violation of 18 U.S.C. §§ 924(c)(1)(B)(i) and 2)

On or about June 16, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, aiding and abetting one another, did knowingly use, carry and brandish a firearm, to-wit: a short-barreled shotgun, during and in relation to a crime of violence, namely, conspiracy to interfere with commerce by robbery, in violation of 18 U.S.C. § 1951(a), as alleged in Count One of this indictment, for which the defendants may be prosecuted in a court of the United States, and the defendants, aiding and abetting one another, did knowingly possess and brandish said firearm in furtherance of the commission of this offense.

In violation of 18 U.S.C. §§ 924(c)(1)(B)(i) and 2.

Count Three

Interference with Commerce by Robbery  
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about June 16, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants, **Glover** and **Davis**, aiding and abetting one another, did unlawfully take and obtain personal property, consisting of cartons of cigarettes, from the person and in the presence of A.D., in her capacity as an employee of Murphy Oil USA, 170 N. Interstate 35E, Lancaster, Texas, and against her will by means of actual and threatened force, violence, and fear of immediate injury to her person, that is, by using and brandishing a firearm.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Four

Interference with Commerce by Robbery  
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about June 21, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover**, the defendant, and an unknown female, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendant, **Glover** and an unknown female, aiding and abetting one another, did unlawfully take and obtain personal property, consisting of cartons of cigarettes, from the person and in the presence of T.H., in her capacity as an employee of Murphy Oil USA, 3102 W. Wheatland Road, Dallas, Texas, and against her will by means of actual and threatened force, violence, and fear of immediate injury to her person, that is, by using and brandishing a firearm.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Five

Interference with Commerce by Robbery  
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about June 22, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants, **Glover** and **Davis**, aiding and abetting one another, did unlawfully take and obtain personal property, consisting of cartons of cigarettes, from the person and in the presence of O.G., in her capacity as an employee of Murphy Oil USA, 950 N. Walnut Creek Drive, Mansfield, Texas, and against her will by means of actual and threatened force, violence, and fear of immediate injury to her person, that is, by using and brandishing a firearm.

In violation of 18 U.S.C. §§ 1951(a) and 2.



Count Six

Interference with Commerce by Robbery  
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about June 22, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants, **Glover** and **Davis**, aiding and abetting one another, did unlawfully take and obtain personal property, consisting of cartons of cigarettes and United States currency, from the person and in the presence of C.O., in her capacity as an employee of Murphy Oil USA, 100 Walton Way, Midlothian, Texas, and against her will by means of actual and threatened force, violence, and fear of immediate injury to her person, that is, by using and brandishing a firearm.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Seven

Using, Carrying, and Brandishing a Firearm During and in Relation to, and Possessing and Brandishing a Firearm in Furtherance of, a Crime of Violence  
(Violation of 18 U.S.C. §§ 924(c)(1)(C)(i) and 2)

On or about June 22, 2014, in the Dallas Division of the Northern District of Texas, **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, aiding and abetting one another, did knowingly use, carry, and brandish a firearm, to-wit: a short-barreled shotgun, during and in relation to a crime of violence, namely, interference with commerce by robbery, in violation of 18 U.S.C. §§ 1951(a) and 2, as alleged in Count Six of this indictment, for which the defendants may be prosecuted in a court of the United States, and the defendants, aiding and abetting one another, did knowingly possess and brandish said firearm in furtherance of the commission of this offense..

In violation of 18 U.S.C. §§ 924(c)(1)(C)(i) and 2.

Count Eight

Felon in Possession of a Firearm  
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about June 22, 2014, in the Dallas Division of the Northern District of Texas, **Maurice Lamont Davis**, the defendant, being a person who had been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, that is a felony, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Remington, Model 870, 12 gauge short-barreled shotgun.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Forfeiture Notice

(18 U.S.C. §§ 924(d) and 981(a)(1)(C); 28 U.S.C. § 2461(c))

Upon conviction for the offenses alleged in Counts One, Three, Four, Five or Six of the indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, shall forfeit to the United States of America any property, real or personal, constituting or derived from proceeds traceable to the respective offense.

Further, upon conviction for any of the offenses alleged in Counts Two, Seven or Eight of the indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), **Andre Levon Glover** and **Maurice Lamont Davis**, the defendants, shall forfeit to the United States of America all firearms and ammunition involved or used in the commission of the offenses, including, but not limited to the following:


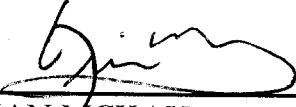
- (1) a Remington, Model 870, 12 gauge short-barreled shotgun; and,
- (2) ammunition recovered with the weapon and from the car.

A TRUE BILL:



FOREPERSON

JOHN PARKER  
ACTING UNITED STATES ATTORNEY

  
JOHN KULL  
Assistant United States Attorney  
Texas State Bar No. 00791057  
1100 Commerce, Third Floor  
Dallas, TX 75242  
Telephone: 214-659-8600  
E-mail: [john.kull@usdoj.gov](mailto:john.kull@usdoj.gov)  
BRIAN MCKAY  
Assistant United States Attorney  
Texas State Bar No. 24046395  
1100 Commerce Street, 3rd Floor  
Dallas, Texas 75242  
Telephone: 214.659.8600  
E-mail: [Brian.McKay@usdoj.gov](mailto:Brian.McKay@usdoj.gov)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

---

THE UNITED STATES OF AMERICA

v.

**3-15 CR0094-P**

ANDRE LEVON GLOVER (1)  
MAURICE LAMONT DAVIS (2)

---

INDICTMENT

18 U.S.C. § 1951(a)  
Conspiracy to Interfere with Commerce by Robbery

18 U.S.C. §§ 924(c)(1)(B)(i) and (2)  
Using, Carrying, and Brandishing a Firearm During and in Relation to,  
And Possessing and Brandishing a Firearm in Furtherance of, a  
Crime of Violence

18 U.S.C. §§ 1951(a) and (2)  
Interference with Commerce by Robbery

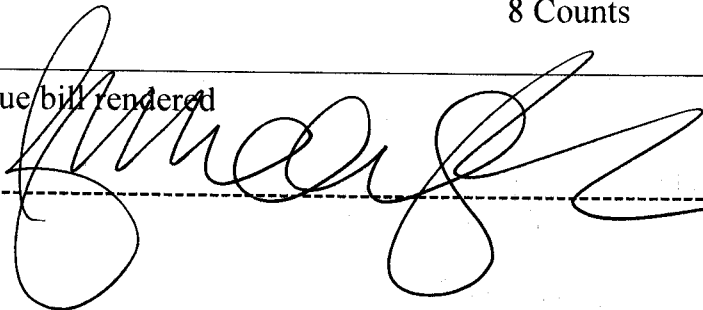
18 U.S.C. §§ 922(g)(1) and 924 (a)(2)  
Felon in Possession of a Firearm

18 U.S.C. §§ 924(d) and 981(a)(1)(C); 28 U.S.C. § 2461(c)  
Forfeiture Notice

8 Counts

---

A true bill rendered



---

---

DALLAS

FOREPERSON

Filed in open court this 3 day of March 2015.

-----  
Clerk

**\*\* Warrants to be Issued for both Andre Levon Glover and Maurice Lamont Davis**

-----  
  
UNITED STATES DISTRICT MAGISTRATE JUDGE

No Criminal matter pending